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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL ITS MOTION TO
COMPEL UBER TO PROVIDE AN
EXECUTED AUTHORIZATION AND
CONSENT FORM FOR THE
280TECHNOLOGIES.SLACK.COM SITE**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal information in its Motion to Compel Uber to provide an executed Authorization and Consent Form for the 280technologies.slack.com site (“Waymo’s Motion), filed concurrently herewith. Specifically, Waymo requests an order granting leave to file under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 3 to Waymo’s Motion	Entire document	Defendants and/or Third Parties
Exhibit 4 to Waymo’s Motion	Entire document	Defendants and/or Third Parties
Exhibit 6 to Waymo’s Motion	Entire document	Defendants and/or Third Parties
Exhibit 7 to Waymo’s Motion	Entire document	Defendants and/or Third Parties
Exhibit 8 to Waymo’s Motion	Entire document	Defendants and/or Third Parties
Exhibit 10 to Waymo’s Motion	Entire document	Defendants and/or Third Parties
Exhibit 11 to Waymo’s Motion	Entire document	Defendants and/or Third Parties

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. DEFENDANTS’ CONFIDENTIAL INFORMATION

Waymo seeks to seal identified portions of these documents because Defendants and/or Third Parties have designated the information confidential and/or highly confidential. Declaration of Lindsay Cooper (“Cooper Decl.”) ¶ 3. Waymo takes no position on the merits of sealing the designated material, and expects Defendants and/or Third Parties to file one or more declarations in accordance with the Local Rules.

1 **III. CONCLUSION**

2 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the
3 above listed documents accompany this Administrative Motion. For the foregoing reasons,
4 Waymo respectfully requests that the Court grant Waymo's Administrative Motion.

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6 DATED: November 8, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

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8 By /s/ Charles K. Verhoeven

Charles K. Verhoeven

9 Attorneys for WAYMO LLC
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